

**WINDELS MARX LANE & MITTENDORF, LLP**

156 West 56th Street  
New York, New York 10019  
Tel: (212) 237-1000  
Fax: (212) 262-1215  
Howard L. Simon  
Kim M. Longo  
John J. Tepedino

*Special Counsel for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

REALTY NEGOTIATORS DEFINED BENEFIT  
PENSION PLAN; DAVID ABEL, individually,  
and in his capacity as Trustee for REALTY  
NEGOTIATORS DEFINED BENEFIT PENSION  
PLAN,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05438 (SMB)

**CASE MANAGEMENT NOTICE**

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. The Initial Disclosures shall be due: December 21, 2015.
2. Fact Discovery shall be completed by: March 23, 2017.
3. The Disclosure of Case-in-Chief Experts shall be due: June 12, 2017.
4. The Disclosure of Rebuttal Experts shall be due: August 14, 2017.
5. The Deadline for Completion of Expert Discovery shall be: September 13, 2017.
6. The Deadline for Service of a Notice of Mediation Referral shall be: September 20, 2017.
7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: October 4, 2017.
8. The Deadline for Conclusion of Mediation shall be: February 1, 2018.

Dated: New York, New York  
October 15, 2015

WINDELS MARX LANE & MITTENDORF,  
LLP

By: /s/ Howard L. Simon

Howard L. Simon

Kim M. Longo

John J. Tepedino

156 West 56th Street

New York, NY 10019

212-237-1000

*Special Counsel for Irving H. Picard, Esq.,  
Trustee for the Substantively Consolidated  
SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and Bernard L.  
Madoff*